

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

ROSY GIRON DE REYES, *et al.*,

Plaintiff,

v.

WAPLES MOBILE HOME PARK  
LIMITED PARTNERSHIP, *et al.*,

Defendants.

Civil No.: 1:16cv563-TSE-TCB

**MOTION FOR THREE-DAY EXTENSION TO DEFENDANTS' DATE TO SUBMIT A  
REPLY IN SUPPORT OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Defendants Waples Mobile Home Park Limited Partnership, Waples Project Limited Partnership, and A. J. Dwoskin & Associates, Inc. (collectively "Defendants"), by counsel, respectfully submit this Motion for Three-day Extension to Defendants' Date to Submit a Reply in Support of Defendants' Motion for Summary Judgment.

Defendants respectfully request the Court to extend the date to submit Defendants' Reply in Support of Defendants' Motion for Summary Judgment from January 3, 2017 to January 6, 2017 because of counsel's holiday travel schedule. Concurrently herewith, Defendants have filed a supporting memorandum of points and authorities. A proposed Order is attached.

**Local Rule 37(E) Certification**

Defendants' counsel conferred in good faith with counsel for Plaintiffs regarding this Motion but counsel were unable to reach agreement.

Respectfully submitted,

WAPLES MOBILE HOME PARK LIMITED  
PARTNERSHIP, WAPLES PROJECT LIMITED  
PARTNERSHIP AND  
A. J. DWOSKIN & ASSOCIATES, INC.

/s/

---

Grayson P. Hanes (VSB No. 06614)

Michael S. Dingman (VSB No. 30031)

Justin deBettencourt (VSB No. 83806)

7900 Tysons One Place

Suite 500

McLean, Virginia 22102

(703) 641-4200 (Telephone)

(703) 641-4340 (Facsimile)

[ghanes@reedsmith.com](mailto:ghanes@reedsmith.com)

[mdingman@reedsmith.com](mailto:mdingman@reedsmith.com)

[jdebettencourt@reedsmith.com](mailto:jdebettencourt@reedsmith.com)

*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 2nd day of December, 2016, I caused the foregoing to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing to all counsel of record.

/s/

Grayson P. Hanes (VSB No. 06614)  
Michael S. Dingman (VSB No. 30031)  
Justin deBettencourt (VSB No. 83806)  
7900 Tysons One Place  
Suite 500  
McLean, Virginia 22102  
(703) 641-4200 (Telephone)  
(703) 641-4340 (Facsimile)  
ghanes@reedsmith.com  
mdingman@reedsmith.com  
jdebettencourt@reedsmith.com